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Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL LERMA, *et al.*,

Defendants.

No. CR 2:18-00172 (A) -GW

[FINAL] JOINT PROPOSED VERDICT
FORM

Trial Date: February 25, 2025
Trial Time: 8:00 a.m.
Location: Courtroom of the
Hon. George H. Wu

Plaintiff United States of America, by and through its counsel
of record, the Acting United States Attorney for the Central District
of California, and Assistant United States Attorneys Kyle W. Kahan,

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1 Kellye Ng, and Jason A. Gorn, and defendant Michael Lerma, by and
2 through his counsel of record Marri Derby and Joel M. Furman,
3 defendant Carlos Gonzalez, by and through his counsel of record
4 Richard G. Novak and Kenneth Miller, defendant Juan Sanchez, by and
5 through his counsel of record Charles Diamond, Amy Lucas, Rachel H.
6 Lee, and Richard P. Lasting, and defendant Jose Valencia Gonzalez, by
7 and through his counsel of record Shaun Khojayan and Daniel Nardoni,
8 hereby submit their [Final] Joint Proposed Verdict Form in the above-
9 captioned case.

10
11 Dated: March 26, 2025

Respectfully submitted,

12 JOSEPH T. MCNALLY
13 Acting United States Attorney

14 LINDSEY GREER DOTSON
15 Assistant United States Attorney
Chief, Criminal Division

16 /s/
17 KYLE W. KAHAN
18 KELLYE NG
JASON A. GORN
Assistant United States Attorneys
19 Attorneys for Plaintiff
20 UNITED STATES OF AMERICA
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23 Dated: March 26, 2025

(with email authorization)

24 MARRI DERBY
25 JOEL M. FURMAN
Attorneys for Defendant
26 MICHAEL LERMA
27
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2
3 Dated: March 26, 2025

(with email authorization)

4 RICHARD G. NOVAK
5 KENNETH MILLER
6 Attorneys for Defendant
7 CARLOS GONZALEZ

8 Dated: March 26, 2025

(with email authorization)

9 CHARLES DIAMOND
10 AMY LUCAS
11 RACHEL H. LEE
12 RICHARD P. LASTING
13 Attorneys for Defendant
14 JUAN SANCHEZ

15 Dated: March 26, 2025

(with email authorization)

16 SHAUN KHOJAYAN
17 DANIEL NARDONI
18 Attorneys for Defendant
19 JOSE VALENCIA GONZALEZ
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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL LERMA, *et al.*,

Defendants.

No. CR 2:18-00172 (A) -GW

VERDICT FORM

COUNT ONE

Racketeer Influenced and Corrupt Organizations ("RICO") Conspiracy

ALL DEFENDANTS

COUNT ONE - DEFENDANT MICHAEL LERMA:

1. We, the jury in the above-captioned case, unanimously find the defendant MICHAEL LERMA (check one):

_____ NOT GUILTY

_____ GUILTY

of RICO Conspiracy as charged in Count One of the First Superseding Indictment.

If your response to Question 1 is *Guilty*, you must also answer Question 1a. If your response to Question 1 is *Not Guilty*, do not answer Question 1a and proceed to Question 2.

In order to find defendant MICHAEL LERMA guilty as to Count One, you must have unanimously found that he knew or contemplated that one or more members of the conspiracy would commit at least two (or more) acts of racketeering in furtherance of the conspiracy and you must unanimously agree on those same two (or more) racketeering acts.

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1 1a. We, the jury in the above-captioned case, unanimously find
2 that defendant MICHAEL LERMA knew or contemplated that one or more
3 members of the conspiracy would engage in a pattern of racketeering
4 activity consisting of at least two or more of the following crimes
5 (*select all that apply*):

- 6 _____ Murder
7 _____ Robbery
8 _____ Extortion
9 _____ Drug Trafficking

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11 **(Proceed to Question 2.)**
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COUNT ONE - DEFENDANT CARLOS GONZALEZ:

2. We, the jury in the above-captioned case, unanimously find the defendant CARLOS GONZALEZ (check one):

____ NOT GUILTY

____ GUILTY

of RICO Conspiracy as charged in Count One of the First Superseding Indictment.

If your response to Question 2 is *Guilty*, you must also answer Question 2a. If your response to Question 2 is *Not Guilty*, do not answer Question 2a and proceed to Question 3.

In order to find defendant CARLOS GONZALEZ guilty as to Count One, you must have unanimously found that he knew or contemplated that one or more members of the conspiracy would commit at least two (or more) acts of racketeering in furtherance of the conspiracy and you must unanimously agree on those same two (or more) racketeering acts.

2a. We, the jury in the above-captioned case, unanimously find that defendant CARLOS GONZALEZ knew or contemplated that one or more members of the conspiracy would engage in a pattern of racketeering activity consisting of at least two or more of the following crimes (select all that apply):

____ Murder

____ Robbery

____ Extortion

____ Drug Trafficking

(Proceed to Question 3.)

COUNT ONE - DEFENDANT JUAN SANCHEZ:

3. We, the jury in the above-captioned case, unanimously find the defendant JUAN SANCHEZ (check one):

_____ NOT GUILTY

_____ GUILTY

of RICO Conspiracy as charged in Count One of the First Superseding Indictment.

If your response to Question 3 is *Guilty*, you must also answer Question 3a. If your response to Question 3 is *Not Guilty*, do not answer Question 3a and proceed to Question 4.

In order to find defendant JUAN SANCHEZ guilty as to Count One, you must have unanimously found that he knew or contemplated that one or more members of the conspiracy would commit at least two (or more) acts of racketeering in furtherance of the conspiracy and you must unanimously agree on those same two (or more) racketeering acts.

3a. We, the jury in the above-captioned case, unanimously find that defendant JUAN SANCHEZ knew or contemplated that one or more members of the conspiracy would engage in a pattern of racketeering activity consisting of at least two or more the following crimes (select all that apply):

_____ Murder

_____ Robbery

_____ Extortion

_____ Drug Trafficking

(Proceed to Question 4.)

COUNT ONE - DEFENDANT JOSE VALENCIA GONZALEZ:

4. We, the jury in the above-captioned case, unanimously find the defendant JOSE VALENCIA GONZALEZ (check one):

_____ NOT GUILTY

_____ GUILTY

of RICO Conspiracy as charged in Count One of the First Superseding Indictment.

If your response to Question 4 is *Guilty*, you must also answer Question 4a. If your response to Question 4 is *Not Guilty*, do not answer Question 4a and proceed to Question 5.

In order to find defendant JOSE VALENCIA GONZALEZ guilty as to Count One, you must have unanimously found that he knew or contemplated that one or more members of the conspiracy would commit at least two (or more) acts of racketeering in furtherance of the conspiracy and you must unanimously agree on those same two (or more) racketeering acts.

4a. We, the jury in the above-captioned case, unanimously find that defendant JOSE VALENCIA GONZALEZ knew or contemplated that one or more members of the conspiracy would engage in a pattern of racketeering activity consisting of at least two or more of the following crimes (*select all that apply*):

_____ Murder

_____ Robbery

_____ Extortion

_____ Drug Trafficking

(Proceed to Question 5.)

COUNT SEVEN

**Violent Crime in Aid of Racketeering and/or Aiding and Abetting
(First-Degree Murder)**

ALL DEFENDANTS

COUNT SEVEN - DEFENDANT MICHAEL LERMA:

5. We, the jury in the above-captioned case, unanimously find
the defendant MICHAEL LERMA (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Seven of the First Superseding Indictment.

(Proceed to Question 6.)

COUNT SEVEN - DEFENDANT CARLOS GONZALEZ:

6. We, the jury in the above-captioned case, unanimously find the defendant CARLOS GONZALEZ (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Seven of the First Superseding Indictment.

(Proceed to Question 7.)

COUNT SEVEN - DEFENDANT JUAN SANCHEZ:

7. We, the jury in the above-captioned case, unanimously find the defendant JUAN SANCHEZ (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Seven of the First Superseding Indictment.

(Proceed to Question 8.)

COUNT SEVEN - DEFENDANT JOSE VALENCIA GONZALEZ:

8. We, the jury in the above-captioned case, unanimously find the defendant JOSE VALENCIA GONZALEZ (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Seven of the First Superseding Indictment.

(Proceed to Question 9.)

COUNT EIGHT

**First-Degree Murder Within the Special Maritime and Territorial
Jurisdiction of the United States**

ALL DEFENDANTS

COUNT EIGHT - DEFENDANT MICHAEL LERMA:

9. We, the jury in the above-captioned case, unanimously find
the defendant MICHAEL LERMA (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Eight of the First Superseding Indictment.

(Proceed to Question 10.)

COUNT EIGHT - DEFENDANT CARLOS GONZALEZ:

10. We, the jury in the above-captioned case, unanimously find the defendant CARLOS GONZALEZ (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Eight of the First Superseding Indictment.

(Proceed to Question 11.)

COUNT EIGHT - DEFENDANT JUAN SANCHEZ:

11. We, the jury in the above-captioned case, unanimously find the defendant JUAN SANCHEZ (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Eight of the First Superseding Indictment.

(Proceed to Question 12.)

COUNT EIGHT - DEFENDANT JOSE VALENCIA GONZALEZ:

12. We, the jury in the above-captioned case, unanimously find the defendant JOSE VALENCIA GONZALEZ (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Seven of the First Superseding Indictment.

(Proceed to Question 13.)

COUNT TEN

Drug Trafficking Conspiracy

Defendants MICHAEL LERMA and JOSE VALENCIA GONZALEZ

COUNT TEN - DEFENDANT MICHAEL LERMA:

13. We, the jury in the above-captioned case, unanimously find the defendant MICHAEL LERMA (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Ten of the First Superseding Indictment.

If your response to Question 13 is *Guilty*, you must also answer Question 14. If your response to Question 13 is *Not Guilty*, do not answer Question 14 and proceed to Question 15.

14. We, the jury in the above-captioned case, having found defendant MICHAEL LERMA guilty of Count 10, further unanimously find it was reasonably foreseeable that the overall drug conspiracy would involve the following controlled substance(s) (select all that apply):

_____ HEROIN

_____ METHAMPHETAMINE

as charged in Count Ten of the First Superseding Indictment.

(Proceed to Question 15.)

COUNT TEN - DEFENDANT JOSE VALENCIA GONZALEZ:

15. We, the jury in the above-captioned case, unanimously find the defendant JOSE VALENCIA GONZALEZ (check one):

____ NOT GUILTY

____ GUILTY

as charged in Count Ten of the First Superseding Indictment.

If your response to Question 15 is *Guilty*, you must also answer Question 16. If your response to Question 15 is *Not Guilty*, do not answer Question 16 and proceed to Question 17.

16. We, the jury in the above-captioned case, having found defendant JOSE VALENCIA GONZALEZ guilty of Count 10, further unanimously find it was reasonably foreseeable that the overall drug conspiracy would involve the following controlled substance(s) (select all that apply):

____ HEROIN

____ METHAMPHETAMINE

as charged in Count Ten of the First Superseding Indictment.

(Proceed to Question 17.)

COUNT SEVENTEEN

Felon in Possession of a Firearm and Ammunition

Defendant JOSE VALENCIA GONZALEZ

17. We, the jury in the above-captioned case, unanimously find
defendant JOSE VALENCIA GONZALEZ (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Seventeen of the First Superseding Indictment.

(Proceed to Question 18.)

COUNT EIGHTEEN

Felon in Possession of a Firearm and Ammunition

Defendant CARLOS GONZALEZ

18. We, the jury in the above-captioned case, unanimously find
defendant CARLOS GONZALEZ (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Eighteen of the First Superseding Indictment.

(Proceed to Question 19.)

COUNT NINETEEN

Felon in Possession of a Firearm and Ammunition

Defendant JUAN SANCHEZ

19. We, the jury in the above-captioned case, unanimously find defendant JUAN SANCHEZ (check one):

_____ NOT GUILTY

_____ GUILTY

as charged in Count Nineteen of the First Superseding Indictment.

(The foreperson should now sign and date this verdict form.)

DATED: _____, 2025, at Los Angeles, California.

FOREPERSON OF THE JURY